

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

FILED
SCRANTON

APR 7 2000

PER [Signature]
DEPUTY CLERK

(PRO-SE)

Neville M. Russell
A# 75 805 774, Petitioner

V.

I.N.S. (ET-AL),
Respondent,

Notice of Motion for
Appointment of Counsel

NO. 1:00-CV-80536

Sirs:

Please take notice that upon the annexed Affidavid or Affirmation of Neville Russell sworn to or Affirm on the 1st day of April, 2000 and upon the complaint herein, Petitioner will move this Court, Middle District Court of Pennsylvania, U.S. D.J., in room _____, United States Court House, 235 North Washington Ave. Scranton, PA. 18501-1148, on the _____ day of _____, 2_____, at _____ or as soon there after as Counsel can be heard, for an order pursuant to rule 3006 A of the Federal rules of Civil procedures granting the Petitioner the relief to apoint an Attorney as Counsel and assign him to represent me and my Case and situation in the most favorable light.

STATE of PENNSYLVANIA
County of YORK

Date 4-1-2000

Respectfully Submitted by

Neville M. Russell

Neville M. Russell (PRO-SE)

Petitioner

York County Prison
3400 Concord RD.
York, PA. 17402

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

(PRO-SE)

Neville Russell)
A # 75 805 774, Petitioner)

AFFIDAVID/AFFIRMATION

v.)

I.N.S. (ET-AL)
Respondent)

State of Pennsylvania) unsworn Declaration
County of York) pursuant to U.S.C.A.
1746(2)

I Neville Russell, after declaring under the penalty of perjury; deposes and says: I Neville Russell, am the petitioner in the above entitled action, and respectfully move this Court to appoint a suitable and competent Attorney who specialized in Immigration matters to present my case in the most favorable light, to file opposing motions, to contend arguments, issues and facts of the case on my behalf based on the merits of the case.

The reasons why i am entitled to the relief is because i do not have funds to retain an Attorney, and i am not an Attorney or Paralegal and due to the fact that i had probable reasons to believe, that the court will not order me to be produce for the Habeas Corpus hearing. I am respectfully requesting to have an Attorney as counsel to present my case and situation in the most favorable light, based on legal grounds, law and its own merit, because i cannot properly represent myself.

Wherefore, I respectfully request that the court grant the within Motion, as well as such other and further relief, and may be just and proper.

"I declare under penalty of perjury that the foregoing is true and correct".

Respectfully Submitted by

Neville M. Russell
Neville M. Russell

Executed on the

1st

day of

April

2000

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

Neville M. Russell
PETITIONER,

PRO-SE

V.

AFFIRMATION OF SERVICE

IMMIGRATION & NATURALIZATION

SERVICE (ET-AL)

I Neville Russell Declare under the penalty of perjury, that i have on the 1st
day of April, 2000 placed and submitted the within Four (4) copies of
the attatched moving papers, to be mailed through the institutional mailroom facility at
York County Prison, PennsylvANIA to the following parties:

The Clerk of the Court

U.S. DISTRICT Court

Middle District of P ennsylvania

235 North Washington Avenue

Scranton, PA. 18501-1148

U.S. Attorney

Middle District of Pennsylvania

228 Walnut Street

Harrisburg, PA. 17108

JANET RENO, U.S. ATTORNEY

General, U.S. Department
of Justice

10th and CONSTITUTIONAL
AVE, NW WASHINGTON, DC 20530

Submitted by
Neville M. Russell

Neville M. Russell, (PRO-SE)

PETITIONER

York County Prison

York, PA. 17402

Executed on the 1st day of April, 2000

DORIS MEISSNER, INS. Commissioner
425 "I" STREET, NW Room 1203
Washington, DC 20530